

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

Case No. 19-cv-03377-LAP

**SUPPLEMENTAL DECLARATION OF CHRISTIAN G. KIELY**

I, Christian G. Kiely, hereby declare as follows:

1. I am counsel to Defendant and Counterclaim Plaintiff Alan Dershowitz (“Professor Dershowitz”) in this action. I make this supplemental declaration in further support of Professor Dershowitz’s Motion to Compel the Production of Certain Attorney-Client Communications on the Basis of Waiver, or, in the Alternative, Request for *Zolin* Examination.

2. Attached hereto as **Exhibit A** and submitted under seal is a true and correct copy of excerpts of the transcript of the May 7, 2021 deposition of Sharon Churcher in this action.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christian G. Kiely  
Christian G. Kiely

Dated: May 27, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent via the Court's electronic filing system, and served to all counsel of record on May 27, 2021.

/s/ Christian G. Kiely  
Christian G. Kiely